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**Attorneys for the Plaintiffs**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL WERDIGER, INC. and	:
ADAMAS MANUFACTURING CORPORATION,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
LUCENT DIAMONDS, INC. and	:
ALEX GRIZENKO,	:
	:
Defendants.	:
-----	X

Case No.: 07 Civ. 6934 (LMM)

**NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT**

**PLEASE TAKE FURTHER NOTICE** that upon the Motion dated November 16, 2007, of Plaintiffs Michael Werdiger, Inc. ("MWI") and Adamas Manufacturing Corporation ("Adamas" and, collectively with MWI, "Plaintiffs"), by their attorneys, Nixon Peabody LLP, pursuant to Rule 55.2(b) of the Civil Rules of this Court and Federal Rule of Civil Procedure 55(b)(2), for entry of default judgment against Defendants Lucent Diamonds, Inc. and Alex Grizenko for failure to appear, answer, plead, or move with respect to the Complaint (the "Motion"), Plaintiffs will move before the Honorable Lawrence M. McKenna, United States District Judge, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Room 1640, New York, New York 10007, on December 11, 2007, upon submission.

**PLEASE TAKE FURTHER NOTICE** that any opposing submissions shall be served and filed in conformity with the Federal Rules of Civil Procedure, the Local Rules of this Court, and the electronic filing procedures of this Court, with the District Court electronically by registered users of the Court's case filing system (the procedures of the Electronic Case Filing System can be found at <http://www.nysd.uscourts.gov>, the official website for the District Court), with a hard-copy delivered directly (1) to the Honorable Lawrence M. McKenna, United States District Judge, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Room 1640, New York, New York 10007, and (2) to Nixon Peabody LLP, Counsel to the Plaintiffs, 437 Madison Avenue, New York, New York 10022 (Attn: Robert N. H. Christmas, Esq.), no later than ten business days after service of the Motion.

**PLEASE TAKE FURTHER NOTICE** that there shall be no appearance or oral argument of the Motion unless directed by the Court.

Dated: New York, New York  
November 16, 2007

NIXON PEABODY LLP

By: /s/ Robert N. H. Christmas  
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